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Attorneys for Defendants UBER TECHNOLOGIES, INC.
and TRAVIS KALANICK

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOUGLAS O'CONNOR, et al., individually
and on behalf of all others similarly situated,
Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,
Defendant.

HAKAN YUCESOI, et al., individually and
on behalf of all others similarly situated,
Plaintiffs,

v.

UBER TECHNOLOGIES, INC. and TRAVIS
KALANICK,
Defendants.

CASE NO. 13-cv-03826-EMC
CASE NO. 15-cv-00262-EMC

**DEFENDANTS UBER TECHNOLOGIES
INC. AND TRAVIS KALANICK'S
STATEMENT IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 Defendants Uber Technologies, Inc. (“Uber”) and Travis Kalanick (collectively, “Defendants”)
2 support Plaintiffs’ request for preliminary approval of the proposed class action settlement because the
3 settlement is fair, reasonable, and adequate. Defendants also agree to provisional certification of the
4 proposed class, and the filing of amended complaints, for settlement purposes only. While Defendants
5 deny all of Plaintiffs’ claims in these consolidated actions, deny any and all allegations of wrongdoing,
6 fault, liability, or damage of any kind to Plaintiffs and the class, and vigorously dispute that they have
7 engaged in any actionable conduct, they have agreed to resolve the cases to avoid the expenses,
8 uncertainties, delays, and other risks inherent in continued litigation. In particular, Defendants reserve
9 all of their objections to class certification for litigation purposes, and do not consent to certification of
10 the proposed class for any purpose other than to effectuate the settlement.

11 Defendants respectfully request that the Court enter the Proposed Order Granting Motion for
12 Preliminary Approval of Settlement.

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14 DATED: March 11, 2019

GIBSON, DUNN & CRUTCHER LLP

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16 By: /s/ Theane Evangelis
Theane Evangelis

17 Attorneys for Defendants UBER TECHNOLOGIES,
18 INC. and TRAVIS KALANICK
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